

Exhibit A



Dykema Gossett PLLC
10 South Wacker Drive
Suite 2300
Chicago, Illinois 60606
WWW.DYKEMA.COM
Tel: (312) 876-1700
Fax: (312) 627-2302
Ryan C. Williams
Direct Dial: (312) 627-5680
Email: RWILLIAMS@DYKEMA.COM
VIA FACSIMILE

April 29, 2009

Patrick J. Keating
Luke P. Sheridan
O'Hagan Spencer, L.L.C.
One East Wacker Drive
Suite 3400
Chicago, IL 60601
(312) 422-6124
(312) 422-6110 (fax)

Re: *Great West Casualty Company v. Volvo Trucks North America, Inc., 08 cv 02872*

Dear Mr. Keating and Mr. Sheridan:

Subject to client approval, we believe Volvo Trucks would be willing to stipulate to certain facts pertaining to the fire in the subject truck. It appears that Volvo Trucks and Great West are in agreement that the EGR pipe played a role in the cause of the fire in the subject truck. Thus, it seems it would be wasteful for the parties to engage in extensive fact discovery on this issue. We suggest that the parties consider a stipulation of certain facts in an attempt to reduce the overall cost of the litigation and to move the case more quickly to a final resolution.

If your client is open to a possible stipulation, please provide us with the facts that Great West would like Volvo Trucks to stipulate to regarding the EGR pipe's role in the fire. Once and if we are able to reach an agreed upon stipulation, we will revisit the scope of Great West's written discovery to Volvo Trucks to determine its continuing relevance. Please let us know as soon as possible how your client wishes to proceed on this request.

DyKEMA

Patrick J. Keating

Luke P. Sheridan


April 29, 2009

Page 2

Should you have any questions, please feel free to contact us.

Very truly yours,

DYKEMA GOSSETT PLLC



Ryan C. Williams

cc: Charles A. LeMoine
Daniel M. Noland

Exhibit B



Dykema Gossett PLLC
10 South Wacker Drive
Suite 2300
Chicago, Illinois 60606
WWW.DYKEMA.COM
Tel: (312) 876-1700
Fax: (312) 627-2302
Ryan C. Williams
Direct Dial: (312) 627-5680
Email: RWILLIAMS@DYKEMA.COM
VIA REGULAR MAIL AND FACSIMILE

June 1, 2009

Patrick J. Keating
Luke P. Sheridan
O'Hagan Spencer, L.L.C.
One East Wacker Drive
Suite 3400
Chicago, IL 60601
(312) 422-6124
(312) 422-6110 (fax)

Re: *Great West Casualty Co. v. Volvo Trucks North America, Inc.*, 08 cv 02872

Dear Mr. Keating and Mr. Sheridan:

Enclosed please find Volvo Trucks' Answer to Plaintiff's First Set of Interrogatories and Answer to Plaintiff's Supplemental Requests to Admit.

Should you have any questions, please feel free to contact us.

Very truly yours,

DYKEMA GOSSETT PLLC

A handwritten signature in black ink, appearing to be "Ryan C. Williams", written over a horizontal line. The signature is stylized with a large "R" and "W".

Ryan C. Williams

Enclosure

cc: Charles A. LeMoine
 Daniel M. Noland

Exhibit C



Dykema Gossett PLLC
10 South Wacker Drive
Suite 2300
Chicago, Illinois 60606

WWW.DYKEMA.COM

Tel: (312) 876-1700

Fax: (312) 627-2302

Ryan C. Williams

Direct Dial: (312) 627-5680

Email: RWILLIAMS@DYKEMA.COM

VIA HAND DELIVERY

June 5, 2009

Patrick J. Keating
Luke P. Sheridan
O'Hagan Spencer, L.L.C.
One East Wacker Drive
Suite 3400
Chicago, IL 60601

Re: Great West Casualty Co. v. Volvo Trucks North America, Inc., 08 cv 02872

Dear Mr. Keating and Mr. Sheridan:

Enclosed please find Volvo Trucks' Response to Plaintiff's Request to Produce and documents numbered VTNA_0038 – VTNA_0126.

Should you have any questions, please feel free to contact us.

Very truly yours,

DYKEMA GOSSETT PLLC

A handwritten signature in black ink, appearing to be "RW" followed by a long horizontal line.

Ryan C. Williams

Enclosure

cc: Charles A. LeMoine
Daniel M. Noland

Exhibit D

Williams, Ryan

From: Williams, Ryan
Sent: Friday, June 26, 2009 11:27 AM
To: Luke Sheridan
Cc: LeMoine, Charles A.; Noland, Daniel M.
Subject: Great West: Meet and Confer

Luke,

Per our meet and confer conference on June 25, 2009, you agreed to provide us the following documents, if these documents are in existence:

- (1) The maintenance folders for the Volvo trucks identified by Chicago Logistics as Trucks 501 - 505;
- (2) All claim/progress notes pertaining to Chicago Logistics' claim to Great West for the Subject Truck.

Also, please provide us with Scott Cordin's address, as we will be taking his deposition. We are available to take depositions anytime during the week of July 20, 2009, except for Thursday, July 23, 2009 in the afternoon. Please contact me if the above does not reflect your understanding of our conversation. Please also contact me with regard to your availability during the week of July 20, 2009.

Ryan

Ryan C. Williams
Attorney

Dykema

10 S. Wacker Drive, Suite 2300
Chicago, IL 60606
312.627.5680
312.876.1155 (fax)
RWilliams@Dykema.com
www.dykema.com

Exhibit E

Williams, Ryan

From: Williams, Ryan
Sent: Tuesday, July 07, 2009 4:57 PM
To: Luke Sheridan
Cc: LeMoine, Charles A.; Noland, Daniel M.
Subject: Great West: 7/7/09 Meet and Confer

Luke,

Per our meet and confer conference on July 7, 2009, you agreed to provide us the following documents, if these documents are in existence:

(1) The maintenance folders for the Volvo trucks with VINs 4V4NC9GH37N437375 and 4V4NC9GH57N437376.

Ryan

Ryan C. Williams
Attorney

Dykema

10 S. Wacker Drive, Suite 2300
Chicago, IL 60606
312.627.5680
312.876.1155 (fax)
RWilliams@Dykema.com
www.dykema.com

GROUP EXHIBIT F

20297-PJK

Case No. 08 C 2872

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

**Great West Casualty Company, as
subrogee of Chicago Logistics, LLC**

Plaintiff,

VS.

Volvo Trucks North America, Inc.

Defendant.

Case No.: 08 C 2872

Judge Joan H. Lefkow
Magistrate Judge Morton Denlow

**DEFENDANT'S NOTICE OF INTENT
TO TAKE ORAL DEPOSITION OF
HEINO SCHARF**

TO: All Counsel of Record
(See Service List included on Certificate of Service)

PLEASE TAKE NOTICE that Plaintiff, Great West Casualty Company, will take the deposition upon oral examination of Heino Scharf, on **August 18, 2009, beginning at 9:00 a.m.** at the offices of O'Hagan Spencer LLC, One E. Wacker Drive., Suite 3400, Chicago, Illinois.


The deposition will take place before a qualified court reporter or other officer authorized by the law to administer oaths and will continue from day to day until completed. The deposition may also be videotaped.

Notice is further given that you are requested to produce for inspection and copying those records listed in the attached Document Rider at the time of the deposition.

Dated: August 4, 2009

Respectfully submitted:

Respectfully submitted:



Counsel for Great West Casualty Company

Patrick J. Keating (ARDC 6211380)
O'Hagan Spencer, LLC
 One East Wacker Drive

Suite 3400
Chicago, Illinois 60601
Ph: 312-422-6100
FAX: 312-422-6110

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document was sent via U.S.
Mail, postage prepaid this 4th day of AUG, 2008, to:

Charles A. LeMoine
Dykema Gossett PLLC
10 S. Wacker Drive
Suite 2300
Chicago, IL 60606

By: 
Attorneys for Plaintiff, Great West Casualty Company

Patrick J. Keating (ARDC No. 6211380)
O'Hagan Spencer LLC
One E. Wacker Drive
Suite 3400
Chicago, IL 60601
312-422-6100 – Phone
312-422-6110 – Fax

Great West Casualty Co., et al v. Volvo Trucks North America, Inc.

Case No.: 2008-CV-2872 (US District Court, No. Dist. of IL)

Our File No.: 20297-PJK

Service List:

Charles LeMoine

Ryan Williams

Daniel Noland

Dykema Gossett PLLC

10 S. Wacker Drive, Suite 2300

Chicago, IL 60606

312-876-1700/312-627-4600 – Main

866-546-2547 – Fax

RWilliams@Dykema.com

Dnoland@dykema.com

20297-PJK

Case No. 08 C 2872

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

Great West Casualty Company, as
subrogee of Chicago Logistics, LLC

Plaintiff,

vs.

Volvo Trucks North America, Inc.

Defendant.

Case No.: 08 C 2872

Judge Joan H. Lefkow

Magistrate Judge Morton Denlow

DEFENDANT'S NOTICE OF INTENT
TO TAKE ORAL DEPOSITION OF
TIM LAFON

TO: All Counsel of Record
(See Service List included on Certificate of Service)

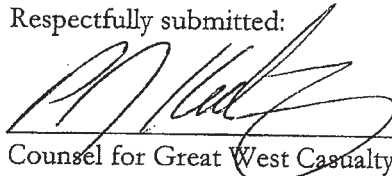
PLEASE TAKE NOTICE that Plaintiff, Great West Casualty Company, will take the deposition upon oral examination of Tim Lafon, on **August 18, 2009, beginning at 1:00 p.m.** at the offices of O'Hagan Spencer LLC, One E. Wacker Drive., Suite 3400, Chicago, Illinois.

The deposition will take place before a qualified court reporter or other officer authorized by the law to administer oaths and will continue from day to day until completed. The deposition may also be videotaped.

Notice is further given that you are requested to produce for inspection and copying those records listed in the attached Document Rider at the time of the deposition.

Dated: August 4, 2009

Respectfully submitted:


Counsel for Great West Casualty Company

Patrick J. Keating (ARDC 6211380)
O'Hagan Spencer, LLC
One East Wacker Drive

Suite 3400
Chicago, Illinois 60601
Ph: 312-422-6100
FAX: 312-422-6110

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document was sent via U.S.

Mail, postage prepaid this 4th day of Aug, 2008, to:

Charles A. LeMoine
Dykema Gossett PLLC
10 S. Wacker Drive
Suite 2300
Chicago, IL 60606

By: 
Attorneys for Plaintiff, Great West Casualty Company

Patrick J. Keating (ARDC No. 6211380)
O'Hagan Spencer LLC
One E. Wacker Drive
Suite 3400
Chicago, IL 60601
312-422-6100 – Phone
312-422-6110 – Fax

Great West Casualty Co., et al v. Volvo Trucks North America, Inc.

Case No.: 2008-CV-2872 (US District Court, No. Dist. of IL)

Our File No.: 20297-PJK

Service List:

Charles LeMoine

Ryan Williams

Daniel Noland

Dykema Gossett PLLC

10 S. Wacker Drive, Suite 2300

Chicago, IL 60606

312-876-1700/312-627-4600 – Main

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RWilliams@Dykema.com

Dnoland@dykema.com

20297-PJK

Case No. 08 C 2872

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

Great West Casualty Company, as
subrogee of Chicago Logistics, LLC

Plaintiff,

vs.

Volvo Trucks North America, Inc.

Defendant.

Case No.: 08 C 2872

Judge Joan H. Lefkow
Magistrate Judge Morton Denlow

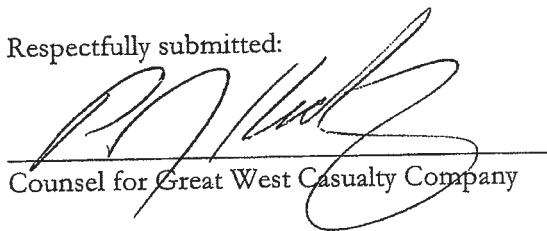
DEFENDANT'S NOTICE OF INTENT
TO TAKE ORAL DEPOSITION OF THE PERSON MOST KNOWLEDGEABLE
FROM VOLVO TRUCKS NORTH AMERICA, INC.

TO: Charles LeMoine, Ryan Williams, and Daniel Noland, Dykema Gossett PLLC
10 S. Wacker Drive, Suite 2300, Chicago, IL 60606

PLEASE TAKE NOTICE that Plaintiff, Great West Casualty Company, will take the deposition upon oral examination pursuant to FRCP 30(b)(6) of an individual with knowledge at Volvo Trucks North America, Inc., regarding the decision to issue Safety Recall RVXX0601 regarding defects in certain Volvo VHO, VNL and VNM model vehicles, including Volvo model number VNL64T semi-tractor with VIN 4V4NC9GHX6N437372. The deposition is scheduled to take place on August 19, 2009 beginning at 9:00 a.m. at the offices of O'Hagan Spencer LLC, One E. Wacker Drive, Suite 3400, Chicago, Illinois 60601.

The deposition will take place before a qualified court reporter or other officer authorized by the law to administer oaths and will continue from day to day until completed. The deposition may also be videotaped.

Respectfully submitted:



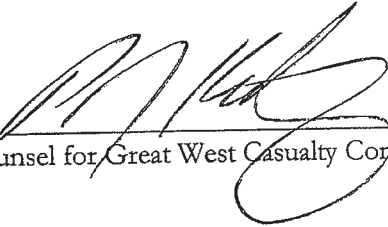
Counsel for Great West Casualty Company

Patrick J. Keating (ARDC 6211380)
Luke P. Sheridan (ARDC 6210035)
O'Hagan Spencer, LLC
One East Wacker Drive
Suite 3400
Chicago, Illinois 60601
Ph: 312-422-6100
FAX: 312-422-6110

CERTIFICATE OF SERVICE

This is to certify that I served this notice by mailing a copy to the attorney(s) listed below, and depositing the same in the U.S. mail at One E. Wacker Drive, Chicago, Illinois, prior to 5:00 p.m., on this 4th day of Aug with proper postage prepaid.

Charles LeMoine
Ryan Williams
Daniel Noland
Dykema Gossett PLLC
10 S. Wacker Drive, Suite 2300
Chicago, IL 60606

By: 
Counsel for Great West Casualty Company

Patrick J. Keating (ARDC No. 6211380)
Luke P. Sheridan (ARDC No. 6210035)
O'Hagan Spencer LLC
One E. Wacker Drive
Suite 3400
Chicago, Illinois 60601
312-422-6100 – Phone
312-422-6110 – Fax

Great West Casualty Co., et al v. Volvo Trucks North America, Inc.

Case No.: 2008-CV-2872 (US District Court, No. Dist. of IL)

Our File No.: 20297-PJK

Service List:

Charles LeMoine

Ryan Williams

Daniel Noland

Dykema Gossett PLLC

10 S. Wacker Drive, Suite 2300

Chicago, IL 60606

312-876-1700/312-627-4600 – Main

866-546-2547 – Fax

RWilliams@Dykema.com

Dnoland@dykema.com